

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

GREG ABBOTT, in his capacity as  
GOVERNOR OF THE STATE OF TEXAS,  
and THE STATE OF TEXAS,

*Defendants.*

Case No. 1:23-cv-00853-DAE

**PLAINTIFF UNITED STATES' EXHIBIT LIST**

In accordance with the Court's scheduling order (ECF 214) and W.D. Tex. Civil Rule 16(f)(4), the United states identifies the following Exhibit List. This list includes those exhibits that the United States expects to offer, as well as those it may offer if the need arises, with each set so identified.

The United States reserves the right to offer additional exhibits for impeachment, or as necessary for rebuttal or to refresh a witness's recollection. Additionally, the United States reserves the right to supplement this list and introduce additional exhibits from facts discovered after the submission of this list. The United States cross-identifies all exhibits used or identified by Defendants and reserves the right to introduce any such exhibits.

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0001	Remote Oral and Videotaped Deposition of Adrian Cortez. Date: 05/22/2024.			*
P-0002	Adrian Cortez Signed Errata. Date: 06/28/2024.			*
P-0003	Adrian Cortez CV (Cortez Dep. Ex. 1).			*
P-0004	Expert Report on Rio Grande Basin Operations (Cortez Dep. Ex. 2). Date: 05/09/2024.			*
P-0005	Letter from Brian Lynk, to Ryan Walters. Identification of United States' anticipated expert witnesses at trial (Cortez Dep. Ex. 3). Date: 01/24/2024.			*
P-0006	Letter from Andrew Knudsen, to Ryan Walters. Identification of United States' anticipated expert witnesses at trial (Cortez Dep. Ex. 4). Date: 05/03/2024.			*
P-0007	"Appendix 3. Table of River Mileages." (Cortez Dep. Ex. 5).			*
P-0008	Navigability Study. Rio Grande, Tributaries, and Lakes (Cortez Dep. Ex. 6). Date: March 1975.			*
P-0009	Deposition of: Benjamin Heber Johnson, Ph.D. Date: 05/29/2024.			*
P-0012	Rio Grande, by Leon C. Metz (Johnson Dep. Ex. 7). Date: 1952.			*
P-0013	Notes on the Upper Rio Grande, by Bryant P. Tilden, Jr. (Johnson Dep. Ex. 9). Date: 1847.			*
P-0014	River of Lost Dreams. Navigation on the Rio Grande, by Pat Kelley (Johnson Dep. Ex. 10). Date: 1928.			*
P-0015	Letter from Daniel W. Kingsbury, to Major W.W. Chapman, A. QR Master, Ft. Brown, Texas. (Johnson Dep. Ex. 11). Date: 05/18/1849.			*
P-0016	Transcription of Letter from Daniel W. Kingsbury, to Major W.W. Chapman, A. QR Master, Ft. Brown, Texas, by Defendants. (Johnson Dep. Ex. 12) Date: 05/18/1849.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0017	Historical maps of the Rio Grande. (Johnson Dep. Ex. 13).			*
P-0019	Great River. The Rio Grande in North American History. By Paul Horgan. (Johnson Dep. Ex. 15).			*
P-0020	Bulletin 48 West Texas Historical and Scientific Society: Publications. (Johnson Dep. Ex. 16) Date: 03/02/1920.			*
P-0022	Map of Eagle Pass, Texas (1887). (Johnson Dep. Ex. 18) Date: 1887.			*
P-0024	Oral and Videotaped Deposition of Tim MacAllister. Date: 05/31/2024.			*
P-0025	First Amended Complaint. (MacAllister Dep. Ex. 5). Date: 09/28/2023.			*
P-0026	33 CFR Part 329 Definition of Navigable Waters of the US. (MacAllister Dep. Ex. 8).			*
P-0027	Report of the American Section of the International Water Commission United States and Mexico. (MacAllister Dep. Ex. 9). Date: 04/21/1930.			*
P-0028	Army Corps of Engineers sets priorities for inland waterways projects. (MacAllister Dep. Ex. 10). Date: 05/22/2024.			*
P-0029	International Boundary and Water Commission (IBWC) United States and Mexico U.S. Section. Rio Grande Canalization Project - Record of Decision. (MacAllister Dep. Ex. 12).			*
P-0030	USACE Navigational Charts. (MacAllister Dep. Ex. 13).			*
P-0031	Gateways to Commerce. (MacAllister Dep. Ex. 14). Date: 1992.			*
P-0032	Chart Coverage in Coast Pilot 4 - Chapter 12. (MacAllister Dep. Ex. 15). Date: 05/26/2024.			*
P-0033	Intracoastal Waterway shipping route, United States. (MacAllister Dep. Ex. 16).			*
P-0034	Tennessee - Tombigbee Waterway. (MacAllister Dep. Ex. 17).			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0035	Remote Oral and Videotaped Deposition of Captain John C. Timmel. Date: 06/05/2024.			*
P-0036	Expert Opinion Report of Captain John C. Timmel. (Timmel Dep. Ex. 1) Date: 05/09/2024.			*
P-0037	Supplemented Disclosure of Additional Information Considered & Erratum (Timmel Dep. Ex. 2). Date: 06/04/2024.			*
P-0038	Captain John C. Timmel Expert Opinion Report. VIII. Expert's C.V. (Timmel Dep. Ex. 5) Date: 05/09/2024.			*
P-0039	Email from Brian Lynk, to John Timmel, et al. USA v. Abbott: Timmel's Interview Questions 9CBP follow-up) (Timmel Dep. Ex. 6). Date: 02/14/2024.	US0000587-588		*
P-0040	Timmel's Interview Questions (Timmel Dep. Ex. 7). Date: 02/01/2024.	US0000585-586		*
P-0041	Email from Brian Lynk, to John Timmel, et al. Information from IBWC (Timmel Dep. Ex. 8). Date: 02/13/2024.	US0000596-598		*
P-0042	Email from Juan Uribe, to Rebecca Rizzuti, et al. Information (Timmel Dep. Ex. 9). Date: 02/12/2024.	US0000794-797		*
P-0043	Email from Brian Lynk, to John Timmel, et al. Follow-up questions from Timmel for CBP (Timmel Dep. Ex. 10). Date: 02/29/2024.	US0000591-594		*
P-0044	Timmel Dep. Ex. 11.			*
P-0045	Email from Melanie Casner, to John Timmel, Brian Lynk. DRAFT REPORT - USACOE Data (Timmel Dep. Ex. 12). Date: 04/19/2024.	US0000801-803		*
P-0046	Oral Deposition of Mario Gomez. Date: 08/07/2023.			*
P-0047	Declaration of Mario Gomez in Support of the United States' Motion for Preliminary Injunction (Gomez Dep. Ex. 1). Date: 07/25/2023.			*
P-0048	CBP Releases June 2023 Monthly Update (Gomez Dep. Ex. 2). Date: 07/18/2023.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0049	Mario Gomez Errata and Certification. Date: 08/08/2023.			*
P-0050	Videoconferenced Oral Deposition of Captain Justin Peters. Date: 08/07/2023.			*
P-0051	Memo from Commander, to Commanding Officer. Navigability Determination (Peters Dep. Ex. 1). Date: 10/19/1984.			*
P-0052	Google Map Image of Rio Grande River (Peters Dep. Ex. 2). Date: 08/07/2023.			*
P-0053	Declaration of Captain Justin Peters (Peters Dep. Ex. 3). Date: 07/25/2023.			*
P-0054	Oral Deposition of Joseph Shelnut. Date: 08/07/2023.			*
P-0055	Subpoena to Testify at a Deposition in a Civil Action to: Mr. Joseph Shelnut. (Shelnutt Dep. Ex. 1). Date: 08/04/2023.			*
P-0056	Declaration of Joseph L. Shelnut. (Shelnutt Dep. Ex. 2). Date: 07/25/2023.			*
P-0057	Map of Texas Districts (Shelnutt Dep. Ex. 3). Date: 08/23/2011.		*	
P-0058	Navigable Waters of the United States in the Fort Worth, Albuquerque, and Tulsa Districts Within the State of Texas (Shelnutt Dep. Ex. 4). Date: 12/20/2011.		*	
P-0059	Title 33 - Navigation and Navigable Waters, Chapter I - Coast Guard, Department of Homeland Security, Subchapter A - General, Part 2 - Jurisdiction, Subpart B - Jurisdictional Terms. Date: 08/03/2023.			*
P-0060	Joseph Shelnut Errata and Certification. Date: 08/09/2023.			*
P-0061	Declaration of Victor Escalon In Opposition to Motion for Preliminary Injunction. Date: 08/09/2023.			*
P-0062	Declaration of Loren Flossman In Opposition to Motion for Preliminary Injunction. Date: 08/09/2023.			*
P-0066	Declaration of Major Chris Nordloh in Opposition to the Motion for Preliminary Injunction. Date: 08/08/2023.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0067	Photograph of Floating Barrier (PI Hearing Ex. G54).			*
P-0068	Photograph of Floating Barrier (PI Hearing Ex. G55).			*
P-0069	Photograph of Floating Barrier (PI Hearing Ex. G56).			*
P-0070	Determination Pursuant to Section 102 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, as Amended, 85 Fed. Reg. 14,953 (March 16, 2020). Date: 03/16/2020.			*
P-0071	Declaration of Abraham Garcia. Date: 07/24/2023.			*
P-0072	Declaration of Jason D. Owens. Date: 07/26/2023.			*
P-0073	Declaration of Capt. Brandy Parker Regarding Navigability Determination of the Rio Grande River. Date: 07/24/2023.			*
P-0074	Declaration of Jennifer T. Pena In Support of the United States' Motion for Preliminary Injunction. Date: 07/25/2023.			*
P-0075	Declaration of Hillary Quam. Date: 07/24/2023.			*
P-0076	Letter from Todd Kim, Jaime Esparaza, to Greg Abbott, Angela Colmenero. Notice of Prospective Filing of Legal Action Regarding Unlawful Activities in Rio Grande River. Date: 07/20/2023.			*
P-0077	Letter from Greg Abbott, to Joseph Biden. Response to notice of prospective filing of legal action regarding unlawful activities in Rio Grande river. Date: 07/24/2023.			*
P-0094	Adrian D. Cortez CV. Date: 05/09/2024.	US0002348-351		*
P-0095	EaglePassDataSetExport-Discharge.Daily Rounded cfs@08458000.csv	US0001112-112		*
P-0096	EaglePassDataSetExport-Discharge.Daily Rounded cfs@08458000-postAmistad.xls	US0001113-113		*
P-0097	EaglePassDataSetExport-Discharge.Daily Rounded cfs@08458000-preAmistad.xlsx	US0001114-114		*
P-0098	EIPasoDataSetExport-Discharge. Daily Rounded cfs@08364000.xlsx	US0001115-115		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0099	FlowM13Jimnez-Median.xlsx	US0001116-116		*
P-0100	General Criteria for Flood Operations at Amistad Dam.	US0001117-135		*
P-0101	Table of Contents. Project Technical Summaries.	US0001136-317		*
P-0102	Expert Report of Adrian Cortez. Date: 05/21/2024.			*
P-0103	Cortez Report Fig. 1. Date: 05/21/2024.			*
P-0104	Cortez Report Fig. 2. Date: 05/21/2024.			*
P-0105	Cortez Report Fig. 3. Date: 05/21/2024.			*
P-0106	Cortez Report Fig. 4. Date: 05/21/2024.			*
P-0107	Cortez Report Table 1. Date: 05/21/2024.			*
P-0108	Cortez Report Fig. 5. Date: 05/21/2024.			*
P-0109	Cortez Report Fig. 6. Date: 05/21/2024.			*
P-0110	Cortez Report Fig. 7. Date: 05/21/2024.			*
P-0111	Cortez Report Table 2. Date: 05/21/2024.			*
P-0112	Cortez Report Table 3. Date: 05/21/2024.			*
P-0113	Cortez Report Fig. 8. Date: 05/21/2024.			*
P-0114	Cortez Report Fig. 9. Date: 05/21/2024.			*
P-0115	Cortez Report Fig. 10. Date: 05/21/2024.			*
P-0116	Cortez Report Fig. 11. Date: 05/21/2024.			*
P-0117	Cortez Report Fig. 12. Date: 05/21/2024.			*
P-0118	Cortez Report Fig. 13. Date: 05/21/2024.			*
P-0119	Email from Esteban Martinez, to Jeremy Wall, et al. Information. Date: 02/12/2024.	IBWC0020377-379		*
P-0120	Email from Rebecca Rizzuti, to Jeremy Wall, et al. Information. Date: 02/12/2024.	IBWC0020385-387		*
P-0121	Email from Juan Urlbe, to Rebecca Rizzuti. Information. Date: 02/12/2024.	IBWC0020432-435		*
P-0122	Email from Sidney Rouch, to Rebecca Rizzuti, et al. Information. Date: 02/12/2024.	IBWC0020437-439		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0123	Email from Evelio Siller, to Rebecca Rizzuti, et al. Information. Date: 02/12/2024.	IBWC0020462-462		*
P-0124	Email from Juan Uribe, to Rebecca Rizzuti, et al. Information. Date: 02/12/2024.	IBWC0020464-467	*	
P-0125	Email from Sidney Rouch, to Rebecca Rizzuti, et al. Information. Date: 02/12/2024.	IBWC0020469-473	*	
P-0126	Drawing from Frank Leslie's Illustrated Newspaper (Johnson Report, p. 28). Date: 09/03/1864.		*	
P-0127	Photograph, Jesse Sumpter, Paso del Aguilar (Johnson Report, p. 29). Date: Approx. 1870s-1880s.		*	
P-0128	Photograph, Jeff Taylor, Sr. (Johnson Report, p. 31). Date: Approx. 1910s-1920s.		*	
P-0130	Johnson Report, Appendix A: Bibliography of Sources Consulted. Date: 05/10/2024.			*
P-0131	Johnson Report, Appendix B: Map of the Lower Rio Grande. Date: 05/10/2024.			*
P-0132	Johnson Report, Appendix C: Lower Rio Grande Timeline. Date: 05/10/2024.		*	
P-0133	Johnson Report, Appendix D: Johnson Resume. Date: 05/10/2024.			*
P-0134	Johnson Report, Appendix E: Additional rule 26(a)(2) Disclosures. Date: 05/10/2024.			*
P-0135	Letter from Kimere Kimball, to Ryan Walters. Supplemental Expert Disclosure of Dr. Benjamin H. Johnson. Date: 05/28/2024.			*
P-0136	Supplemental Expert Report of Benjamin H. Johnson, Ph.D. Date: 05/28/2024.			*
P-0146	Photograph, Eagle Pass 1880s (produced in May 28, 2024 disclosure).		*	



**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0148	The Coast Depot and Shipping Port of the Valley of the Rio-Grande, and the Provinces of Mexico Tributary Thereto, with the Government Map of that Region of Country, Published in 1850, Together with The Report of the Explorations of the Rio Grande. Date: 1850.		*	
P-0149	Watercolor of View of Fort Duncan, near Eagle Pass.		*	
P-0150	Watercolor of Military Colony Opposite Fort Duncan, Texas.		*	
P-0151	Neither Fish Nor Fowl: A Jewish Family on the Rio Grande. Date: 09/20/2023.		*	
P-0152	Handwritten note, Mr. Schuchardt to Mr. Hunter. Report on commerce and trade. Date: 10/30/1881.		*	
P-0153	Life on the Rio Grande.		*	
P-0154	Photograph, Taylor Collection.		*	
P-0155	Photograph, Taylor Collection.		*	
P-0156	Photograph, Taylor Collection.		*	
P-0157	Photograph, Taylor Collection.		*	
P-0158	Photograph, Jeff Taylor, Sr. Collection. Date: Approx. 1910s-1920s.		*	
P-0159	Johnson Report Appendix B, Lower Rio Grande River		*	
P-0160	1923 Report of Chief of Engineers, U.S. Army.		*	
P-0163	Letter from Joe Sheard, to HDQA, et al. Navigability Study of the Rio Grande. Date: 03/31/1975.		*	
P-0164	Annual Reports Index.		*	
P-0165	Annual Reports Index. "Rio Grande, Tex., examination and survey (1923) . . .".		*	
P-0175	Timothy L. MacAllister CV. Date: 05/08/2024.			*
P-0176	Letter from Andrew Knudsen, to Ryan Walters. Supplemental Expert Disclosure of Timothy MacAllister. Date: 05/29/2024.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0177	Expert Report of Timothy L. MacAllister.			*
P-0178	MacAllister Report p. 4.			*
P-0179	MacAllister Report p. 5.			*
P-0180	MacAllister Report p. 6.			*
P-0181	MacAllister Report p. 7.			*
P-0182	MacAllister Report p. 8.			*
P-0183	MacAllister Report p. 9.			*
P-0184	MacAllister Report Appendix A.			*
P-0185	Timothy L. MacAllister CV. Date: 05/29/2024.			*
P-0186	U.S. Army Corps of Engineers 24 - Hour Motorboat Training Testing and Licensing Manual.			*
P-0187	Hydro-Electric Power Plants and Storage Dams.			*
P-0188	Rio Grande Carrizo Cane Eradication Program.			*
P-0189	Defendants' Objections and Answers to Plaintiff's First Set of Interrogatories. Date: 03/11/2024.			*
P-0190	Timmel Report, Exhibit 1. Map of the Rio Grande Originating in Colorado and Extending Through New Mexico, Texas and Mexico Flowing into the Gulf of Mexico. Date: 05/09/2024.		*	
P-0191	Timmel Report, Exhibit 2. Aerial Photo of the Eagle Pass Segment of the Rio Grande with Texas's Marine Floating Barrier Visible on East Side of River. Date: 05/09/2024.		*	
P-0192	Timmel Report, Exhibit 3. Buoy types. Date: 05/09/2024.		*	
P-0193	Timmel Report, Exhibit 4. Pipeline and Floats for Dredge Pumping. Date: 05/09/2024.		*	
P-0194	Timmel Report, Exhibit 5. Swimming Pool Floats. Exhibit 6. Marine Floating Barrier Floats. Date: 05/09/2024.		*	

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0195	Timmel Report, p. 21. Boom (Baum) Blocking the River Foyle During the Siege of Derry in 1689. Modern Day Cochrane Boom Blocking an Entrance to a Waterway. Date: 05/09/2024.		*	
P-0196	Timmel Report, Exhibit 7. Images of Old and New Boom Systems. Exhibit 7. Oil Containment Boom. Date: 05/09/2024.		*	
P-0197	Timmel Report, Exhibit 8. Workers Installing Marine Barrier Note Size and Low Height of Spheres Relative to Workers. Date: 05/09/2024.		*	
P-0198	Timmel Report, Exhibit 9. Marine Floating Barrier Seen in its Entirety Near Shelby Park in Eagle Pass. Date: 05/09/2024.		*	
P-0199	Timmel Report, Exhibit 10. The Mooring Blocks of the Marine Floating Barrier Visible at Low River Level. Exhibit 11. U.S. CBP Airboat Inspecting Barrier Over the Top of One of the Concrete Mooring Blocks. Date: 05/09/2024.		*	
P-0200	Timmel Report, Exhibit 12. Floating Barrier as Seen From East Bank (U.S. Side) of the Rio Grande. Date: 05/09/2024.		*	
P-0201	Timmel Report, Exhibit 13. Image of the Marine Floating Barrier Creating an Obstruction in the Eagle Pass Section of the Rio Grande. Date: 05/09/2024.		*	
P-0202	Timmel Report, Exhibit 14. Aerial View of Marine Floating Barrier with Rough Estimates of Distances. Date: 05/09/2024.		*	
P-0203	Timmel Report, Section VII. Documents, Materials, and Data Considered. Date: 05/09/2024.			*
P-0204	Timmel Report, Section VIII. Expert's C.V. Date: 05/09/2024.			*
P-0205	Timmel Report, Section IX. Cases in Previous Five (5) Years in Which Expert Testified. Date: 05/09/2024.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0206	Timmel Report, Section X. Additional Rule 26(A)(2) Disclosures. Date: 05/09/2024.			*
P-0207	Aerial photograph of Floating Barrier construction.		*	
P-0208	Aerial photograph of Floating Barrier construction.		*	
P-0209	Aerial photograph of Floating Barrier construction.		*	
P-0210	Aerial photograph of Floating Barrier construction.		*	
P-0211	Aerial photograph of Floating Barrier construction.		*	
P-0212	Aerial photograph of Floating Barrier construction.		*	
P-0213	Mario Gomez Declaration p. 8.		*	
P-0214	Mario Gomez Declaration p. 10.		*	
P-0215	Mario Gomez Declaration p. 11.		*	
P-0216	Mario Gomez Declaration p. 12.		*	
P-0217	Mario Gomez Declaration p. 14.		*	
P-0218	Mario Gomez Declaration p. 15.		*	
P-0219	Mario Gomez Declaration p. 16.		*	
P-0220	Mario Gomez Declaration p. 17.		*	
P-0221	Mario Gomez Declaration p. 19.		*	
P-0222	Mario Gomez Declaration p. 20.		*	
P-0223	Mario Gomez Declaration p. 21.		*	
P-0224	Photograph, Joseph Shelnut Declaration p.3.		*	
P-0225	Photograph, Joseph Shelnut Declaration p.4.		*	
P-0226	Memo from Joe Sheard, to HQDA. Navigability Study of the Rio Grande. Date: 03/31/1975.		*	
P-0227	Evelio Siller Declaration p. 3.		*	
P-0228	Evelio Siller Declaration p. 4.		*	
P-0229	Evelio Siller Declaration p. 5.		*	

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0230	Evelio Siller Declaration p. 6.		*	
P-0231	Photograph of Floating Barrier (PI Hearing Ex. G52).		*	
P-0232	Photograph of Floating Barrier (PI Hearing Ex. G53).		*	
P-0233	Photograph of Floating Barrier (PI Hearing G54).		*	
P-0234	Photograph of Floating Barrier (PI Hearing Ex. G55).		*	
P-0235	Photograph of Floating Barrier (PI Hearing Ex. G56).		*	
P-0236	Cochrane website. Maritime security marine floating barrier (PI Hearing Ex. G57).			*
P-0237	Loren Flossman - PI Hearing Examination (excerpt).			*
P-0238	Joseph Shelnutt - PI Hearing Examination (excerpt).			*
P-0239	Objections and Responses to Plaintiff's First Set of Interrogatories. Date: 05/24/2024.			*
P-0244	Water Resource Policies and Authorities Definition of Navigable Waters of the United States. Date: 09/11/1972.			*
P-0245	Water Resource Policies and Authorities Definition of Navigability Policy, Practice and Procedure. Date: 12/15/1965.			*
P-0246	Email from State Department, to "GhiottoPA@state.gov". Secretary Antony J. Blinken, Secretary of Homeland Security Alejandro Mayorkas, Attorney General Merrick Garland, White House Homeland Security Advisor Dr. Liz Sherwood-Randall, Mexican Secretary of Public Security and Citizen Protection Rosa Icela Rodri. Date: 10/05/2023.	DOS_0000170-185	*	
P-0247	Email from Alisla Simmons, to "PRM-WHA". Top Press in the Past 24 Hours. Date: 09/08/2023.	DOS_0000512-515		*
P-0248	Email from Jennifer Pena, to Sally Spener. Follow up on my meeting with Resendez. Date: 07/18/2023.	DOS_0010473-475		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0249	Email from Victor Vazquez, to "Mexico City Tasker - INL", et al. AMLO daily press conference - August 1, 2023. Date: 08/01/2023.	DOS_0011942-972		*
P-0250	Press conference with Antony Blinken and Alicia Barcena.	DOS_0012831-847		*
P-0251	Email from Alex Osborne, to Jacqueline Westernen, et al. Piedras Negras. Date: 07/20/2023.	DOS_0012910-910		*
P-0252	Email from Victor Vazquez, to "Mexico City Tasker - INL", et al. AMLO daily press conference - July 17, 2023. Date: 07/17/2023.	DOS_0012911-943		*
P-0253	Letter from Veronica Escobar, et al, to Merrick Garland, Antony Blinken. Concern about the new aquatic barriers that Texas Governor Greg Abbott has deployed. Date: 07/13/2023.	DOS_0019869-871		*
P-0254	Diplomatic note from Mexican Embassy, to Department of State. Response to diplomatic note regarding Texas activities within the Rio Grande bed in the Eagle Pass area. Date: 07/21/2023.	DOS_0031521-524	*	
P-0255	Spener, et al. HFAC Follow up Request for Brief --IBWC- 1944 Treaty. Date: 08/31/2023.	DOS_0034847-848	*	
P-0257	Diplomatic note from Mexican Embassy, to Department of State. Activities being carried out by the United States in the bed of the Rio Grande in the area of Eagle Pass. Date: 06/26/2023.	DOS_0035212-215	*	
P-0258	Email from Shelu Patel, to Hillary Quam, et al. Rio Grande Buoy Barrier Deployment Information. Date: 07/11/2023.	DOS_0036698-700		*
P-0259	Email from Colton Arciniaga, to Hillary Quam, et al. AMLO daily press conference - August 8, 2023. Date: 08/11/2023.	DOS_0046317-346		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0260	Information Note No. 04. Information note on the United States' activities on the Bravo River in the Eagle Pass area. Date: 07/14/2023.	DOS_0049686-687	*	
P-0261	Information Note No. 05. Information note on the second diplomatic note of the government of Mexico on Texas' activities in the pipeline of the Bravo River in the Eagle Pass area. Date: 07/26/2023.	DOS_0049688-689	*	
P-0262	Courtesy Translation of 7/14/23 SRE Information Note No. 4. Briefing Note on the U.S. Activities on the Rio Grande in the Eagle Pass, Texas Area. Date: 07/14/2023.	DOS_0049690-690	*	
P-0263	Courtesy Translation of 7/26/23 SRE Information Note No. 5. Briefing Note on the second Diplomatic Note of the Government of Mexico on the activities being carried out by the Texas state authorities in the Rio Grande in the Eagle Pass area. Date: 07/26/2023.	DOS_0049691-692	*	
P-0264	Email from Ana Luisa Fajer Flores, to Rachel Poynter. Court ruling on the TX buoy barriers. Date: 09/06/2023.	DOS_0051018-018	*	
P-0265	Email from Sally Spener, to Francisco Sainz, et al. HFAC Follow up Request for Brief --IBWC- 1944 Treaty. Date: 08/31/2023.	DOS_0069399-399		*
P-0267	Email from David Buchholz, to Maxwell Hamilton. AMLO daily press conference - August 22, 2023. Date: 08/22/2023.	DOS_0073714-743		*
P-0268	Email from Rachel Poynter, to Christopher Bodington, et al. For DAS Poynter: HFAC Brief on Mexico's Water Deliveries. Date: 08/18/2023.	DOS_0076618-618		*
P-0270	Email from Adam Sulewski, to Adam Sulewski. AMLO daily press conference - August 22, 2023. Date: 08/23/2023.	DOS_0105793-822		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0272	Email from Francisco Sainz, to Sally Spener, et al. HFAC Follow up Request for Brief --IBWC- 1944 Treaty. Date: 08/31/2023.	DOS_0111660-660		*
P-0273	Email from Maxwell Hamilton, to Francisco Sainz, et al. Concluding Rio Grande Minute Negotiation Sessions. Date: 09/20/2023.	DOS_0118607-608		*
P-0274	Email from Sally Spener, to Maria Elena Griner, et al. Status of Rio Grande meetings? Date: 07/12/2023.	DOS_0118693-694	*	
P-0276	Email from "White House Press Office", to Richard Sonar. Press Briefing by Press Secretary Karine Jean-Pierre. Date: 07/19/2023.	DOS_0122871-893		*
P-0277	Email from Maxwell Hamilton, to Francisco Sainz, et al. HFAC Request for Brief --IBWC- 1944 Treaty. Date: 08/18/2023.	DOS_0125211-213		*
P-0278	Email from Brendan McGovern, to "WHA-MEX Only". WHA/MEX Daily Points, 12 June 2023." Date: 06/12/2023.	DOS_0145946-949		*
P-0280	Email from Maxwell Hamilton, to David Buchholz, et al. AMLO daily press conference - August 22, 2023. Date: 08/22/2023.	DOS_0169645-674		*
P-0281	Email from Maxwell Hamilton, to Hillary Quam, et al. Readout: HFAC Brief on TX Water Negotiations. Date: 09/08/2023.	DOS_0169712-713		*
P-0282	Email from Sally Spener, to Francisco Sainz, et al. Follow up on my meeting with Resendez. Date: 07/18/2023.	DOS_0170381-383	*	
P-0283	Email from Francisco Sainz, to Maxwell Hamilton, et al. HFAC Request for Brief --IBWC- 1944 Treaty. Date: 08/18/2023.	DOS_0174935-937	*	
P-0284	Email from Ken Salazar, to Mark Johnson, et al. AMLO daily press conference - July 26, 2023. Date: 07/27/2023.	DOS_0180615-636		*
P-0286	Email from "International", to "mexcitysintesis@state.gov". English Language News/Aug 22, 2023/Evening. Date: 08/22/2023.	DOS_0186517-540		*



**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0287	Email from David Suarez, to "Mexico City-Mananera Live". Mananera Live--United States omnibus: AMLO talks USMCA, Texas, Florida, fentanyl. Date: 08/22/2023.	DOS_0188419-420		*
P-0288	Email from Luis Ramirez, to "Mexico City-Mananera Live". Mananera Live: AMLO sends letter praising POTUS; He blasts the UN. Date: 08/09/2023.	DOS_0188869-869		*
P-0289	Email from Hillary Quam, to "Mexico City Tasker - POL", et al. AMLO daily press conference - August 28, 2023. Date: 08/28/2023.	DOS0193083-121		*
P-0290	Diplomatic note from the Ministry of Foreign Affairs. Date: 08/17/2023.	DOS0193125-125	*	
P-0291	Email from Sally Spener, to "jgould@usbr.gov", et al. Can IBWC sign our Rio Grande Minute in Boulder City this week? Date: 12/11/2023.	IBWC0000384-384		*
P-0292	Email from Sally Spener, to Maria Elena Giner, et al. Canceled: Rio Grande Minute Signing. Date: 12/15/2023.	IBWC0000387-387		*
P-0293	Email from Sally Spener, to Maria Elena Giner, et al. Clarify text edits RE: New draft Rio Grande Minute for review/discussion this week. Date: 09/06/2023.	IBWC0000394-396		*
P-0294	Email from Sally Spener, to Francisco Sainz. Rio Grande Policy Work Group mid-summer update webinar - July 31 proposed. Date: 07/18/2023.	IBWC0000602-603		*
P-0295	Email from Sally Spener, to Maria Elena Giner, et al. Status of Rio Grande meetings? Date: 07/12/2023.	IBWC0000614-615		*
P-0296	Email from Sally Spener, to Francisco Sainz. Follow up on my meeting with Resendez. Date: 07/18/2023.	IBWC0000928-930		*
P-0297	Email from Francisco Sainz, to Sally Spener, et al. HFAC Follow up Request for Brief --IBWC- 1944 Treaty. Date: 08/31/2023.	IBWC0000951-951		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0298	Email from Sally Spener, to Krista Kyle. Postponed meeting with Chihuahua. Date: 07/18/2023.	IBWC0001052-053		*
P-0299	Letter from Adriana Resendez Maldonado, to Maria-Elena Giner. Field visit performed by this Mexican Section. Date: 06/09/2023.	IBWC0001603-605		*
P-0300	Letter from Adriana Resendez Maldonado, to Maria-Elena Giner. Follow up on 6/9/2023 letter. Date: 07/14/2023.	IBWC0001607-608		*
P-0301	Letter from Adriana Resendez Maldonado, to Maria-Elena Giner. Follow up on 6/9 and 7/14/2023 letters. Date: 07/26/2023.	IBWC0001610-611		*
P-0302	Letter from Jose de Jesus Luevano Grano, to Maria-Elena Giner. Response to 8/10/2023 letter regarding activities carried out by the State of Texas. Date: 08/14/2023.	IBWC0001613-614		*
P-0303	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 6/9/2023 letter regarding personnel, vehicles, and equipment observed within the Rio Grande. Date: 06/22/2023.	IBWC0001623-623		*
P-0304	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 7/26/2023 letter regarding construction activities carried out by the State of Texas. Date: 08/10/2023.	IBWC0001629-631		*
P-0305	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 7/26/2023 letter regarding construction activities carried out by the State of Texas. Date: 08/10/2023.	IBWC0001632-633		*
P-0306	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 08/14/2023 letter regarding construction activities carried out by the State of Texas. Date: 08/16/2023.	IBWC0001636-636		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0307	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Realignment of the barrier buoys undertaken by the State of Texas to move the buoys closer to the United States. Date: 09/13/2023.	IBWC0001640-658		*
P-0308	Memo from John Claudio, to Ramon Macias III. Binational Survey of State of Texas buoys in Eagle Pass TX. Date: 08/30/2023.	IBWC0003233-239		*
P-0309	Email from Ramon Macias, to Padinare Unnikrishna, et al. Report on floating barriers. Date: 07/26/2023.	IBWC0004998-002		*
P-0310	Email from Maria Elena Giner, to Francisco Sainz, et al. Field Survey. Date: 07/26/2023.	IBWC0006070-070		*
P-0311	Email from Francisco Sainz, to Jennifer Pena, et al. Field Survey. Date: 07/26/2023.	IBWC0006071-071		*
P-0312	Email from Mario Castro, to Juan Uribe, et al. Survey boat safety check. Date: 07/19/2019.	IBWC0006866-867		*
P-0313	Email from Mario Gomez, to Ramon Macias, et al. CILA survey at Eagle Pass. Date: 08/24/2023.	IBWC0008385-387		*
P-0314	Email from Loren Flossman, to Victor Escalon, et al. River Floating Fence//Pontoon. Date: 02/23/2024.	STATE_003590-590		*
P-0315	Texas Turns the Tide.	STATE_003624-635		*
P-0316	Email from Madeleine Winslow, to Jeffrey Gilmore, et al. Cochrane//DPS 7.14.23. Date: 07/14/2023.	STATE_004028-029		*
P-0317	Buoy Project End of Week Report 7.14.23. Date: 07/14/2023.	STATE_004030-035		*
P-0318	Email from Loren Flossman, to Victor Escalon, et al. Floating you barrier System. Date: 09/30/2023.	STATE_004036-036		*
P-0319	Email from Loren Flossman, to Victor Escalon, et al. Issues Passive discs between buoys. Date: 08/09/2023.	STATE_004041-041		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0320	Email from Isaac Gonzalez, to Madeleine Winslow, et al. Cochrane//DPS 7.14.23. Date: 07/14/2023.	STATE_004046-047		*
P-0321	Email from Arturo Delagarza, to Loren Flossman, et al. RIVER FLOATING FENCE. Date: 02/23/2024.	STATE_004048-048		*
P-0322	Email from Andrew Mahaleris, to Tabatha Vasquez, et al. WSJ request: border buoys. Date: 08/29/2023.	STATE_004049-052		*
P-0323	Email from Coulter Tallent, to Tony Pena, et al. Border Update - 1045 CT, 14 Jun 2023. Date: 06/14/2023.	STATE_004056-057		*
P-0324	Floating Barrier System (FBS) Evaluation Report Outbrief. Date: 09/14/2023.	STATE_004086-101		*
P-0325	"8. Impacts from FBS to Agencies Operating Along the Rio Grande River".	STATE_004124-141		*
P-0326	Floating Buoy Barrier Update to DPS Regional Director Victor Escalon.	STATE_004142-151		*
P-0327	Texas Department of Public Safety. Floating Barrier System   Evaluation Report. Date: 09/14/2023.	STATE_004184-221		*
P-0328	Videoconference Deposition of Heather Lee Miller, PHD. Date: 07/01/2024.			*
P-0329	Expert Report of Heather Lee Miller, PhD (Miller Dep. Ex. 1). Date: 06/14/2024.			*
P-0330	Miller Dep. Ex. 2.			*
P-0331	Deposition of F. Douglas Shields, Jr., PhD. Date: 07/01/2024.			*
P-0332	"F.D. Shields' Testimony." (Shields Dep. Ex. 1)			*
P-0333	Reasonableness of proposed improvement of the Rio Grande for navigation downstream of Amistad Dam (Shields Dep. Ex. 2). Date: 06/14/2024.			*
P-0334	Funding and Managing the U.S. Inland Waterways System: hat Policy Makers Need to Know: What Policy Makers Need to Know (Shields Dep. Ex. 3). Date: 2015.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0335	Engineering and Design Layout and Design of Shallow-Draft Waterways (Shields Dep. Ex. 4). Date: 07/31/1997.			*
P-0336	Evaporative Losses from Major Reservoirs in Texas (Shields Dep. Ex. 5). Date: May 2021.			*
P-0337	Shields Dep. Ex. 6.			*
P-0338	Deposition of Ancil Taylor. Date: 07/03/2024.			*
P-0339	Expert Report of Ancil Taylor (Taylor Dep. Ex. 1). Date: 06/14/2024.			*
P-0340	Data table (Taylor Dep. Ex. 2).			*
P-0341	Barge Transportation (Taylor Dep. Ex. 3).			*
P-0342	Taylor Dep. Ex. 4.			*
P-0343	Taylor Dep. Ex. 5.			*
P-0344	Taylor Dep. Ex. 6.			*
P-0345	Taylor Dep. Ex. 7.			*
P-0346	Oral Deposition of Kathy Ann Alexander, PhD. Date: 07/08/2024.			*
P-0347	Letter from Johnathan Stone, to Brian Lynk. Identification of State Defendants' Anticipated Expert Witness. (Alexander Dep. Ex. 1). Date: 06/14/2024.			*
P-0348	Water Code § 11.023. (Alexander Dep. Ex. 2) Date: 06/10/2019.			*
P-0349	Water Code § 11.121. (Alexander Dep. Ex. 3) Date: 06/17/2015.			*
P-0350	30TAC § 297.1. (Alexander Dep. Ex. 4) Date: 05/28/2020.			*
P-0351	Water Code § 11.0235. (Alexander Dep. Ex. 5) Date: 09/01/2007.			*
P-0352	Water Code § 11.096. (Alexander Dep. Ex. 6)			*
P-0353	Deposition of Thomas Ciarametaro. Date: 07/09/2024.			*
P-0354	Expert Witness Report. Prepared by Thomas P. Ciarametaro. (Ciarametaro Dep. Ex. 1) Date: 06/14/2024.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0355	Thomas P. Ciarametaro, Jr. CV. (Ciarametaro Dep. Ex. 2)			*
P-0356	Oral Deposition of Christine Marie Magers. Date: 07/09/2024.			*
P-0357	Magers Dep. Ex. 1.			*
P-0358	Magers Dep. Ex. 2.			*
P-0359	Magers Dep. Ex. 3.			*
P-0360	Magers Dep. Ex. 4.			*
P-0361	Magers Dep. Ex. 6.			*
P-0362	Oral Deposition of Carlos Rubinstein. Date: 07/09/2024.			*
P-0363	Expert Report of Carlos Rubinstein & Herman R. Settemeyer. (Rubinstein Dep. Ex. 1).			*
P-0364	Carolos Rubinstein CV. (Rubinstein Dep. Ex. 2).			*
P-0365	Rio Grande/Rio Bravo River Basin (Rubinstein Dep. Ex. 3).			*
P-0366	Water Code § 1.003. (Rubinstein Dep. Ex. 3). Date: 09/01/2011.			*
P-0367	Oral Deposition of Michael Banks. Date: 07/10/2024.			*
P-0368	Drone footage.			*
P-0369	Banks Dep. Ex. 3.			*
P-0370	Banks Dep. Ex. 4.			*
P-0371	Banks Dep. Ex. 5.			*
P-0372	Banks Dep. Ex. 6.			*
P-0373	Banks Dep. Ex. 7.			*
P-0374	Banks Dep. Ex. 8.			*
P-0375	Banks Dep. Ex. 9.			*
P-0376	Banks Dep. Ex. 10.			*
P-0377	Oral Deposition of Herman Robert Settemeyer. Date: 07/10/2024.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0378	Herman Robert Settemeyer CV. (Settemeyer Dep. Ex. 2).			*
P-0379	Oral Deposition of Eleftherios Iakovou, Ph.D. Date: 07/11/2024.			*
P-0380	Expert Opinion Report Prepared by: Eleftherios Iakovou, Ph.D. (Iakovou Dep. Ex. 1). Date: 06/14/2024.			*
P-0381	Email from Johnathan Stone, to Andrew Knudsen, et al. Terms re: Lefteris Dep. (Iakovou Dep. Ex. 2). Date: 07/11/2024.			*
P-0382	Oral and Videotaped Deposition of Micky Donaldson. Date: 07/18/2024.			*
P-0383	Donaldson Dep. Ex. A.			*
P-0384	Donaldson Dep. Ex. B.			*
P-0385	Donaldson Dep. Ex. C.	US0002301-301	*	
P-0386	Donaldson Dep. Ex. D.			*
P-0387	Donaldson Dep. Ex. E.	CBP0000319-319		*
P-0388	Donaldson Dep. Ex. F.			*
P-0389	Videotape Deposition of Margaret Gaffney-Smith. Date: 07/12/2024.			*
P-0390	Gaffney-Smith Dep. Ex. 1.			*
P-0391	33 CFR Part 329 Definition of Navigable Waters of the US. (Gaffney-Smith Dep. Ex. 3).			*
P-0392	Aerial photo from drone footage.			*
P-0393	Map.			*
P-0394	Gaffney-Smith Dep. Ex. 6.			*
P-0395	Aerial photo from drone footage.			*
P-0396	Oral and Videotaped Deposition of Ivan Morua. Date: 07/18/2024.			*
P-0397	Morua Dep. Ex. 1.			*
P-0398	Morua Dep. Ex. 2.			*
P-0399	Morua Dep. Ex. 3.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0400	Videotaped Oral Deposition of Isela Canava. Date: 07/15/2024.			*
P-0401	Defendants' Second Amended Notice of Intent to Take Oral and Videotaped Deposition of the U.S. Section of the International Boundary and Water Commission Pursuant to Rule 30(b)(6). (Canava Dep. Ex. 1). Date: 07/09/2024.			*
P-0402	Letter from Brian Lynk, to Ryan Walters. Fed. R. Civ. P. 30(b)(6) witness designations of USIBWC. (Canava Dep. Ex. 2). Date: 07/12/2024.			*
P-0403	Flood and Emergency Operations Manual Amistad Dam and Power Plant Project. Date: April 2024.			*
P-0404	International Boundary and Water Commission (IBWC) United States and Mexico U.S. Section. About Us. (Canava Dep. Ex. 4).			*
P-0405	9 Stat. 928 (Feb. 2, 1848) -- Treaty with the Republic of Mexico, Article VII. (Canava Dep. Ex. 5). Date: 02/02/1848.			*
P-0406	United States v. Rio Grande Dam & Irrigation Co. 174 U.S. 690 (1899). (Canava Dep. Ex. 6). Date: 05/22/1899.			*
P-0407	Convention Between the United States of America and The United States of Mexico. (Canava Dep. Ex. 7). Date: 09/14/1886.			*
P-0408	Binational Border Solutions Strategic Plan Fiscal Years 2021 - 2025. (Canava Dep. Ex. 9). Date: Sept. 2022.			*
P-0409	International Boundary and Water Commission weighs in on new buoy system along the Rio Grande. (Canava Dep. Ex. 10). Date: 06/10/2023.			*
P-0410	IBWC wants to study Texas governor's plans to put buoys in middle of Rio Grande. (Canava Dep. Ex. 11). Date: 06/12/2023.			*



**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0411	The other border dispute is over an 80-year-old water treaty. (Canava Dep. Ex. 12). Date: 06/06/2024.			*
P-0412	Sinkholes in Amistad Dam threaten international border water reservoir. (Canava Dep. Ex. 13). Date: 12/20/2023.			*
P-0413	Status of Deliveries and New Minute. (Canava Dep. Ex. 14).			*
P-0414	USIBWC Stream Gaging Program & Water Data Portal. (Canava Dep. Ex. 15). Date: 04/02/2024.			*
P-0415	30(b)(6) Videotape Deposition of the Coast Guard By and Through Retired Captain Kevin Kiefer and Captain Michael Cintron. Date: 07/17/2024.			*
P-0416	Defendants' Amended Notice of Intent to Take Oral and Videotaped Deposition of the U.S. Coast Guard Pursuant to Rule 30(b)(6) (30(b)(6) Dep. Ex. 1). Date: 07/16/2024.			*
P-0417	Oral and Videotaped Deposition of Walker Smith. Date: 07/18/2024.			*
P-0418	Smith Dep. Ex. 1.			*
P-0419	Smith Dep. Ex. 2.			*
P-0420	Smith Dep. Ex. 3.			*
P-0421	Smith Dep. Ex. 4.			*
P-0422	Smith Dep. Ex. 5.			*
P-0423	Smith Dep. Ex. 6.			*
P-0424	Smith Dep. Ex. 7.			*
P-0425	Smith Dep. Ex. 7A.			*
P-0426	Email from J.J. Harder, to Sean Torriente, et al. OS Law Enforcement Brief 21 July. Date: 07/21/2023.	DOS_0031501-501		*
P-0427	Email from Mark Johnson, to Rachel Poynter, et al. TX Buoy Barrier Ruling. Date: 09/06/2023.	DOS_0035380-382		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0428	Email from Mark Johnson, to Brian Naranjo. TX Buoy Barrier Ruling. Date: 09/06/2023.	DOS_0050208-209		*
P-0429	Email from Francisco Sainz, to Maxwell Hamilton, et al. HFAC Request for Brief -- IBWC- 1944 Treaty. Date: 08/18/2023.	DOS_0069265-266		*
P-0430	Email from Mark Johnson, to Ken Salazar. TX Buoy Barrier Ruling. Date: 09/06/2023.	DOS_0118940-941		*
P-0431	Email from Eric Jacobstein, to Mark Wells. Readout from Barcena dinner and bilat with S1. Date: 08/10/2023.	DOS_0120030-032		*
P-0432	Email from Mark Johnson, to Ken Salazar. TX Buoy Barrier Ruling. Date: 09/06/2023.	DOS_0146320-320		*
P-0434	Memo from "SECSTATE WASHDC". The Secretary's July 21 Conversation with Mexican FS Barcena. Date: 07/28/2023.	DOS_0199858-861	*	
P-0435	Memo from "SECSTATE WASHDC". The Secretary's August 10, 2023, Meeting with Mexican FS Barcena. Date: 08/17/2023.	DOS_0199862-870	*	
P-0436	Memo from "SECSTATE WASHDC". Secretary Blinken's Participation in the January 19, 2024 Migration Ministerial with Mexico. Date: 03/04/2024.	DOS_0199871-883	*	
P-0437	Daily Activity Report. Date: 07/17/2023.	DOS_0199884-889		*
P-0438	Email from Francisco Sainz, to Francisco Sainz. Translation letter. Request intervention on the removal of barriers along the Rio Grande Floodplain. Date: 04/12/2024.	DOS0191798-798		*
P-0440	Email from Ramon Macias, to Padinare Unnikrishna, et al. Report on floating barriers. Date: 07/25/2023.	IBWC0004304-308		*
P-0441	Email from Jennifer Pena, to Sally Spener, et al. AMLO Comments on Rio Grande Barriers. Date: 07/27/2023.	IBWC0005709-710		*
P-0442	Email from Jennifer Pena, to Francisco Sainz, et al. UPDATE re: "inflatable" Wall on water? Date: 08/05/2023.	IBWC0006146-152		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0443	Email from Francisco Sainz, to Sally Spener, et al. News reports - TX buoys are in Mexico, Mx sends dip note RE: AMLO Comments on Rio Grande Barriers. Date: 07/27/2023.	IBWC0006687-690		*
P-0444	Regulatory Decision Sheet. Date: 04/08/2002.	USACE0000113-235		*
P-0445	Regulatory Decision Sheet. Date: 06/10/2002.	USACE0000241-294		*
P-0446	Regulatory Actions.	USACE0000295-382		*
P-0447	Regulatory Decision Sheet. Date: 10/29/1991.	USACE0000383-384		*
P-0448	Letter from Wayne Lea, to A. Brad Groves. Proposal by the city of Eagle Pass to construct a boat ramp and conduct bank stabilization work on the Rio Grande River. Date: 01/30/1991.	USACE0000385-390		*
P-0449	Navigable Waters of the United States in the Fort Worth, Albuquerque, and Tulsa Districts Within the State of Texas. Date: 03/20/1999.	USACE0000502-502		*
P-0450	USACE spreadsheet of TX permits.	USACE0006646-646		*
P-0451	Email from Neil Lebsock, to Calvin Kroeger. Chief's RFI. Date: 10/23/2023.	USACE0007998-001		*
P-0452	Definition of Navigable Waters of the United States, 37 Fed. Reg. 18,289 (Sep. 9, 1972). Date: 09/09/1972.	USACE0008329-332		*
P-0453	List of Bridges Over the Navigable Waters of the United States. Date: 1927.	USACE0008333-827		*
P-0454	Granting consent of Congress to Texas-Coahuila Bridge Company for construction of a bridge across the Rio Grande between Eagle Pass, Texas, and Piedras Negras, Mexico. H.R. 4034, 69th Cong. (1926). Date: 02/02/1926.	USACE0009245-246		*
P-0455	Bridge Across the Rio Grande at Eagle Pass, Tex. Report. Date: 04/19/1926.	USACE0009247-248		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0456	Title 33 - Navigation and Navigable Waters, Chapter II - Corps of Engineers, War Department. Date: 10/29/1946.	USACE0009249-251		*
P-0457	Environmental Assessment for Facilities Expansion at Naval Nuclear Power Training Unit-Charleston (NPTU Charleston), Joint Base Charleston, South Carolina. Date: Sept. 2012.	USACE0009487-834		*
P-0458	RioGrande_Spatial_MAR1975 Date: March 1975.	USACE0011072-072		*
P-0459	Environmental Handbook. Water Resources. Date: Aug. 2023.	USACE0011155-187		*
P-0460	Email from Pete Crum, to "MRC - jpa Permits", et al. JPA SUBMITTAL: Norfolk Naval Shipyard (Portsmouth VA) - Waterfront Port Security Barrier System Installation. Date: 11/15/2016.	USACE0011392-413		*
P-0461	Email from "MRC - jpa Permits", to Lou Atkins. MHI Lambert's Point Force Protection. Date: 08/17/2014.	USACE0011443-457		*
P-0462	Letter from Stephen Decker, to Louis Pfingst. Department of the Army permit application to construct a Port Security Barrier. Date: 01/14/2015.	USACE0011473-475		*
P-0463	Email from Jessica Barker, to "MRC - jpa Permits". Permit Application for the Installation of New Anchors for the Existing Port Security Barrier System at Naval Station Norfolk, Norfolk, VA. Date: 10/25/2012.	USACE0011488-500		*
P-0464	Letter from Kimberly Prisco-Baggett, to W. David Noble. Department of the Army permit application to upgrade the existing Port Security Barrier system. Date: 04/09/2013.	USACE0011520-531		*
P-0465	Email from Michael Anderson, to Marshall Smith, et al. Navy Waterfront Barrier at Naval Station. Date: 03/11/2013.	USACE0011533-536		*
P-0466	Letter from J. Robert Hume, to Commander Navy Region. Proposed Barrier at the Norfolk Naval Base. Date: 02/10/2005.	USACE0011537-538		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0467	Email from Michael Anderson, to Stephen Powell, et al. Review of recent submittals from U.S. Navy (Waterfront Anti-Terrorism Barrier). Date: 03/11/2013.	USACE0011548-551		*
P-0468	Email from Rebecca Francese, to "MRC - jpa Permits", et al. BAE Systems - Security Barrier, Norfolk, VA. Date: 05/24/2013.	USACE0011556-567		*
P-0469	Email from Justine Woodward, to Beth Howell. BAE Security Barrier - Section 408 Review. Date: 06/29/2015.	USACE0011568-580		*
P-0470	Memorandum for Records. Department of the Army Memorandum Documenting General Permit Verification. Date: 09/15/2015.	USACE0011581-588		*
P-0471	Memorandum for Record. Department of the Army Memorandum Documenting Nationwide Permit Verification/General Permit Verification. Date: 09/17/2013.	USACE0011589-622		*
P-0472	Letter from Kimberly Prisco-Baggett, to Eddie Goldman. Department of the Army application to install 685 linear feet of security barrier. Date: 09/17/2013.	USACE0011623-630		*
P-0473	Letter from Brian Denson, to Eddie Goldman. Department of the Army application to install 3,877 linear feet of a floating security barrier. Date: 09/15/2015.	USACE0011631-637		*
P-0474	Memorandum for Record. Department of the Army Memorandum Documenting General Permit Verification. Date: 05/18/2015.	USACE0011742-746		*
P-0475	Letter from Sage Joyce, to Michael Jones. Department of the Army application to temporarily install a 350 linear foot floating security barrier. Date: 05/18/2015.	USACE0011773-774		*
P-0476	Letter from Robert Flowers, to Secretary of the Army. Gulf Intracoastal Waterway, Brazos River to Port O'Connor, Matagorda Bay Re-Route, Texas. Date: 12/24/2002.	USACE0011972-974		*
P-0477	Fact Sheet. Intracoastal Waterway Jacksonville to Miami, FL. Date: May 2024.	USACE0011991-992		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0478	Fact Sheet. Atlantic Intracoastal Waterway - Norfolk to St. Johns. Date: May 2023.	USACE0011993-994		*
P-0479	Fact Sheet Operation and Maintenance. Date: 04/02/2024.	USACE0011996-996		*
P-0480	Fact Sheet Operation and Maintenance. Date: 04/02/2024.	USACE0011997-997		*
P-0481	Fact Sheet Gulf Intracoastal Waterway, TX Operation and Maintenance. Date: 06/18/2024.	USACE0012004-007		*
P-0482	The Gulf Intracoastal Waterway Project.	USACE0012011-014		*
P-0483	Gulf Intracoastal Waterway (GIWW) Caloosahatchee River to Anclote River Dredge Readiness and Operation Plan (DROP). Date: 02/07/2019.	USACE0012015-039		*
P-0484	Jacksonville District AIWW/IWW Update. Date: 11/13/2023.	USACE0012116-129		*
P-0485	Atlantic Intracoastal Waterway Between <redacted> Norfolk, VA., and the St. Johns River, Florida. Date: 09/30/1996.	USACE0012131-132		*
P-0486	Intracoastal Waterway, Jacksonville to Miami, Florida. Date: 09/30/1996.	USACE0012135-137		*
P-0487	Olmsted Locks and Dam Project. Date: 10/05/2021.	USACE0012205-208		*
P-0488	Photograph.	CBP0000067-067	*	
P-0489	DPS and TNG Deployment of Floating Barrier System. Date: 06/14/2023.	CBP0000089-090	*	
P-0490	Photograph.	CBP0000232-232	*	
P-0491	Email. Daily Report - Water Buoy. Date: 07/11/2023.	CBP0000252-253	*	
P-0492	Buoy Project Daily Report 7.10.2023. Date: 07/10/2023.	CBP0000254-259	*	
P-0493	Cochrane//DPS Weekly Check In 7.21.23. Date: 07/21/2023.	CBP0000262-263	*	
P-0494	DPS//Cochrane Weekly Check In 7.21.23. Date: 07/21/2023.	CBP0000264-269	*	
P-0495	Turn the Tide.	CBP0000271-281	*	
P-0496	Photograph.	CBP0000329-329	*	

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0497	Email to "DRS-SBPA". Situational Awareness: DPS Buoys in EGT AO. Date: 07/14/2023.	CBP0000766-766	*	
P-0498	Photograph.	CBP0000771-771	*	
P-0499	Photograph.	CBP0000772-772	*	
P-0500	Photograph.	CBP0000773-773	*	
P-0501	Photograph.	CBP0000774-774	*	
P-0502	Photograph.	CBP0000775-775	*	
P-0503	Photograph.	CBP0000776-776	*	
P-0504	Photograph.	CBP0000777-777	*	
P-0505	Photograph.	CBP0000778-778	*	
P-0506	Photograph.	CBP0000798-798	*	
P-0507	Memo from Maria-Elena Giner, to Adrianna Resendez Maldonado. Regarding activities carried out by the State of Texas in the Rio Grande channel in the area of Eagle Pass, Texas. Date: 07/28/2023.	IBWC0004404-405		*
P-0508	Ancil Taylor Supplemental Report Spreadsheet. Date: 07/01/2024.			*
P-0509	John Timmel Site Visit Photograph.	US0003573-573		*
P-0510	John Timmel Site Visit Photograph.	US0003574-574		*
P-0511	John Timmel Site Visit Photograph.	US0003575-575		*
P-0512	John Timmel Site Visit Photograph.	US0003576-576		*
P-0513	John Timmel Site Visit Photograph.	US0003577-577		*
P-0514	John Timmel Site Visit Photograph.	US0003578-578		*
P-0515	John Timmel Site Visit Photograph.	US0003579-579		*
P-0516	John Timmel Site Visit Photograph.	US0003580-580		*
P-0517	John Timmel Site Visit Photograph.	US0003581-581		*
P-0518	John Timmel Site Visit Photograph.	US0003582-582		*
P-0519	John Timmel Site Visit Photograph.	US0003583-583		*



**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0520	John Timmel Site Visit Photograph.	US0003584-584		*
P-0521	John Timmel Site Visit Photograph.	US0003585-585		*
P-0522	John Timmel Site Visit Photograph.	US0003586-586		*
P-0523	John Timmel Site Visit Photograph.	US0003587-587		*
P-0524	John Timmel Site Visit Photograph.	US0003588-588		*
P-0525	John Timmel Site Visit Photograph.	US0003589-589		*
P-0526	John Timmel Site Visit Photograph.	US0003590-590		*
P-0527	John Timmel Site Visit Photograph.	US0003591-591		*
P-0528	John Timmel Site Visit Photograph.	US0003592-592		*
P-0529	John Timmel Site Visit Photograph.	US0003593-593		*
P-0530	John Timmel Site Visit Photograph.	US0003594-594		*
P-0531	John Timmel Site Visit Photograph.	US0003595-595		*
P-0532	John Timmel Site Visit Photograph.	US0003596-596		*
P-0533	John Timmel Site Visit Photograph.	US0003597-597		*
P-0534	John Timmel Site Visit Photograph.	US0003598-598		*
P-0535	John Timmel Site Visit Photograph.	US0003599-599		*
P-0536	John Timmel Site Visit Photograph.	US0003600-600		*
P-0537	John Timmel Site Visit Photograph.	US0003601-601		*
P-0538	John Timmel Site Visit Photograph.	US0003602-602		*
P-0539	John Timmel Site Visit Photograph.	US0003603-603		*
P-0540	John Timmel Site Visit Video.	US0003604-604		*
P-0541	John Timmel Site Visit Video.	US0003605-605		*
P-0542	John Timmel Site Visit Video.	US0003606-606		*
P-0543	Mike Chapman Site Visit Photograph.	US0003607-607		*
P-0544	Mike Chapman Site Visit Photograph.	US0003608-608		*
P-0545	Mike Chapman Site Visit Photograph.	US0003609-609		*
P-0546	Mike Chapman Site Visit Photograph.	US0003610-610		*



**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0547	Mike Chapman Site Visit Photograph.	US0003611-611		*
P-0548	Mike Chapman Site Visit Photograph.	US0003612-612		*
P-0549	Mike Chapman Site Visit Photograph.	US0003613-613		*
P-0550	Mike Chapman Site Visit Photograph.	US0003614-614		*
P-0551	Mike Chapman Site Visit Photograph.	US0003615-615		*
P-0552	Mike Chapman Site Visit Photograph.	US0003616-616		*
P-0553	Mike Chapman Site Visit Photograph.	US0003617-617		*
P-0554	Mike Chapman Site Visit Photograph.	US0003618-618		*
P-0555	Mike Chapman Site Visit Photograph.	US0003619-619		*
P-0556	Mike Chapman Site Visit Photograph.	US0003620-620		*
P-0557	Mike Chapman Site Visit Photograph.	US0003621-621		*
P-0558	Mike Chapman Site Visit Photograph.	US0003622-622		*
P-0559	Mike Chapman Site Visit Photograph.	US0003623-623		*
P-0560	Mike Chapman Site Visit Photograph.	US0003624-624		*
P-0561	Mike Chapman Site Visit Photograph.	US0003625-625		*
P-0562	Mike Chapman Site Visit Photograph.	US0003626-626		*
P-0563	Mike Chapman Site Visit Photograph.	US0003627-627		*
P-0564	Mike Chapman Site Visit Photograph.	US0003628-628		*
P-0565	Mike Chapman Site Visit Photograph.	US0003629-629		*
P-0566	Mike Chapman Site Visit Photograph.	US0003630-630		*
P-0567	Mike Chapman Site Visit Photograph.	US0003631-631		*
P-0568	Mike Chapman Site Visit Photograph.	US0003632-632		*
P-0569	Mike Chapman Site Visit Photograph.	US0003633-633		*
P-0570	Mike Chapman Site Visit Photograph.	US0003634-634		*
P-0571	Mike Chapman Site Visit Photograph.	US0003635-635		*
P-0572	Mike Chapman Site Visit Photograph.	US0003636-636		*
P-0573	Mike Chapman Site Visit Photograph.	US0003637-637		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0574	Mike Chapman Site Visit Photograph.	US0003638-638		*
P-0575	Mike Chapman Site Visit Photograph.	US0003639-639		*
P-0576	Mike Chapman Site Visit Photograph.	US0003640-640		*
P-0577	Mike Chapman Site Visit Photograph.	US0003641-641		*
P-0578	Mike Chapman Site Visit Photograph.	US0003642-642		*
P-0579	Mike Chapman Site Visit Photograph.	US0003643-643		*
P-0580	Mike Chapman Site Visit Photograph.	US0003644-644		*
P-0581	Mike Chapman Site Visit Photograph.	US0003645-645		*
P-0582	Mike Chapman Site Visit Photograph.	US0003646-646		*
P-0583	Mike Chapman Site Visit Photograph.	US0003647-647		*
P-0584	Mike Chapman Site Visit Photograph.	US0003648-648		*
P-0585	Mike Chapman Site Visit Photograph.	US0003649-649		*
P-0586	Mike Chapman Site Visit Photograph.	US0003650-650		*
P-0587	Mike Chapman Site Visit Photograph.	US0003651-651		*
P-0588	Mike Chapman Site Visit Photograph.	US0003652-652		*
P-0589	Mike Chapman Site Visit Photograph.	US0003653-653		*
P-0590	Mike Chapman Site Visit Photograph.	US0003654-654		*
P-0591	Mike Chapman Site Visit Photograph.	US0003655-655		*
P-0592	Mike Chapman Site Visit Photograph.	US0003656-656		*
P-0593	Mike Chapman Site Visit Photograph.	US0003657-657		*
P-0594	Mike Chapman Site Visit Photograph.	US0003658-658		*
P-0595	Mike Chapman Site Visit Photograph.	US0003659-659		*
P-0596	Mike Chapman Site Visit Photograph.	US0003660-660		*
P-0597	Mike Chapman Site Visit Photograph.	US0003661-661		*
P-0598	Mike Chapman Site Visit Photograph.	US0003662-662		*
P-0599	Mike Chapman Site Visit Photograph.	US0003663-663		*
P-0600	Mike Chapman Site Visit Photograph.	US0003664-664		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0601	Mike Chapman Site Visit Photograph.	US0003665-665		*
P-0602	Mike Chapman Site Visit Photograph.	US0003666-666		*
P-0603	Mike Chapman Site Visit Photograph.	US0003667-667		*
P-0604	Mike Chapman Site Visit Photograph.	US0003668-668		*
P-0605	Mike Chapman Site Visit Photograph.	US0003669-669		*
P-0606	Mike Chapman Site Visit Photograph.	US0003670-670		*
P-0607	Mike Chapman Site Visit Photograph.	US0003671-671		*
P-0608	Mike Chapman Site Visit Photograph.	US0003672-672		*
P-0609	Mike Chapman Site Visit Photograph.	US0003673-673		*
P-0610	Mike Chapman Site Visit Photograph.	US0003674-674		*
P-0611	Mike Chapman Site Visit Photograph.	US0003675-675		*
P-0612	Mike Chapman Site Visit Photograph.	US0003676-676		*
P-0613	Mike Chapman Site Visit Photograph.	US0003677-677		*
P-0614	Mike Chapman Site Visit Photograph.	US0003678-678		*
P-0615	Mike Chapman Site Visit Photograph.	US0003679-679		*
P-0616	Mike Chapman Site Visit Photograph.	US0003680-680		*
P-0617	Mike Chapman Site Visit Photograph.	US0003681-681		*
P-0618	Mike Chapman Site Visit Photograph.	US0003682-682		*
P-0619	Mike Chapman Site Visit Photograph.	US0003683-683		*
P-0620	Mike Chapman Site Visit Photograph.	US0003684-684		*
P-0621	Mike Chapman Site Visit Photograph.	US0003685-685		*
P-0622	Mike Chapman Site Visit Photograph.	US0003686-686		*
P-0623	Mike Chapman Site Visit Photograph.	US0003687-687		*
P-0624	Mike Chapman Site Visit Photograph.	US0003688-688		*
P-0625	Mike Chapman Site Visit Photograph.	US0003689-689		*
P-0626	Mike Chapman Site Visit Photograph.	US0003690-690		*
P-0627	Mike Chapman Site Visit Photograph.	US0003691-691		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0628	Mike Chapman Site Visit Photograph.	US0003692-692		*
P-0629	Tim MacAllister Site Visit Photograph.	US0003804-804		*
P-0630	Tim MacAllister Site Visit Photograph.	US0003805-805		*
P-0631	Tim MacAllister Site Visit Photograph.	US0003806-806		*
P-0632	Tim MacAllister Site Visit Photograph.	US0003807-807		*
P-0633	Tim MacAllister Site Visit Photograph.	US0003808-808		*
P-0634	Tim MacAllister Site Visit Photograph.	US0003809-809		*
P-0635	Benjamin Johnson Site Visit Photograph.	US0003810-810		*
P-0651	Benjamin Johnson Site Visit Photograph.	US0003826-826		*
P-0661	Letter from Crawford Martin, to J.R. Singleton. Liability of State for injuries caused by bulkhead bounding San Jacinto State Park & Houston Ship Channel and State's recourse against Corps of Engineers who maintain Houston Ship Channel. Date: 05/01/1969.	US0003919-923		*
P-0662	Letter from Crawford Martin, to John Allen. State and Federal Relations as to Texas streams -- both as to projects and water uses. Date: 11/24/1970.	US0003924-933		*
P-0663	Letter from Charles Lind, to James Morris. Whether a navigable bayou located wholly in Orange County, Texas, is subject to the provisions of the River and Harbor Act of Congress, and also whether the construction across said bayou of a fixed span bridge with a vertical clearance of 35 feet is taking of property for which the State or County would be liable to an upstream landowner whose ships require a minimum vertical clearance of 55 feet. Date: 12/31/1964.	US0003934-938		*
P-0664	PI Hearing Transcript. Date: 08/22/2023.			*
P-0665	Oral and Videotaped Deposition of Neil Lebsock. Date: 07/08/2024.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0667	Plaintiff's Amended Response to Defendants' First Set of Interrogatories to Plaintiff. (Lebsock Dep. Ex. 2). Date: 05/03/2024.			*
P-0668	Oral Videotaped Deposition Hillary Quam. Date: 07/09/2024.			*
P-0669	Treaty and Non-Treaty Mechanisms for Resolving the Rio Grande River Water Debt Dilemma. (Quam Dep. Ex. 1). Date: 12/12/2022.			*
P-0670	Mexico-U.S. Joint Communique: Mexico and the United States Reaffirm Their Shared Commitments on an Orderly, Humane and Regular Migration. (Quam Dep. Ex. 2). Date: 12/28/2023.			*
P-0671	Operation Lone Star. Date: July 2023.	STATE_004380-388		*
P-0672	Operation Lone Star. Date: July 2023.	STATE_004547-555		*
P-0673	Operation Lone Star. Date: July 2023.	STATE_004571-579		*
P-0674	Email TF Eagle River Barrier Storyboard. Date: 02/02/2023.	STATE_004694-695		*
P-0675	River Barrier Survey. Date: Feb. 2023.	STATE_004696-697		*
P-0676	River Barrier Survey. Date: Feb. 2023.	STATE_004698-699		*
P-0677	Email DPS Buoy Proposal. Date: 04/03/2023.	STATE_004700-740		*
P-0678	Turn the Tide.	STATE_004761-771		*
P-0679	Texas Turns the Tide.	STATE_004772-789		*
P-0680	River Barrier Survey. Date: 02/01/2023.	STATE_004790-791		*
P-0681	River Barrier Survey. Date: 02/01/2023.	STATE_004794-795		*
P-0682	Email DPS//Cochrane Weekly Check In 6.9.2023. Date: 06/10/2023.	STATE_004801-803		*
P-0683	Memo Trip Report from J5 Team visit to TF Eagle Area of Operations (AO). Date: 05/04/2023.	STATE_004824-826		*
P-0684	Memo Trip Report from J5 Team visit to TF Eagle Area of Operations (AO). Date: 05/04/2023.	STATE_004829-831		*
P-0685	Operation Lone Star. Date: March 2024.	STATE_004985-993		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0686	Operation Lone Star. Date: March 2024.	STATE_005003-012		*
P-0687	Email Boat Information. Date: 12/01/2023.	STATE_005071-072		*
P-0688	Coastal Bend Airboats invoice. Date: 05/30/2023.	STATE_005073-074		*
P-0689	Transport Boats invoice. Date: 06/07/2023.	STATE_005075-076		*
P-0690	Email Boats. Date: 12/01/2023.	STATE_005077-078		*
P-0691	EmbeddedFile6.xlsx	STATE_005169-169		*
P-0692	Operation Lone Star. Date: June 2023.	STATE_005811-820		*
P-0693	Email JTF-LS 200900JUL2023 COP Date: 07/20/2023.	STATE_005876-881		*
P-0694	Email JTF-LS 210900JUL2023 COP Date: 7/21/2023.	STATE_006013-018		*
P-0695	Operation Lone Star. Date: June 2023.	STATE_006324-333		*
P-0696	Email JTF-LS 250900JAN2024 COP Date: 01/25/2024.	STATE_006496-502		*
P-0697	Email JTF-LS 300900JUL2023 COP Date: 07/30/2023.	STATE_007059-064		*
P-0698	CONOP: Operation Flat Top. Date: 09/12/2023.	STATE_007205-205		*
P-0699	Email Buoy Info Eagle Pass. Date: 06/16/2023.	STATE_007901-902		*
P-0700	Email DPS//Cochrane Weekly Check In 6.16.2023. Date: 06/20/2023.	STATE_007906-908		*
P-0701	Email River Barrier Survey. Date: 02/02/2023.	STATE_007936-937		*
P-0702	River Barrier Survey. Date: 02/01/2023.	STATE_007938-939		*
P-0703	Email Border Protection Alternative Technologies. Date: 01/04/2023.	STATE_007963-965		*
P-0704	Operation Lone Star. Date: Sept. 2023.	STATE_008254-263		*
P-0705	Operation Lone Star. Date: Aug. 2023.	STATE_008272-280		*
P-0706	Operation Lone Star. Date: April 2023.	STATE_008289-298		*
P-0707	Operation Lone Star. Date: July 2023.	STATE_008338-346		*
P-0708	Operation Lone Star. Date: June 2023.	STATE_008353-363		*
P-0709	Operation Lone Star. Date: May 2023.	STATE_008392-401		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0710	Operation Lone Star. Date: Aug. 2023.	STATE_008405-413		*
P-0711	Operation Lone Star. Date: Dec. 2023.	STATE_008417-425		*
P-0712	Operation Lone Star. Date: Feb. 2024.	STATE_008431-439		*
P-0713	Email JTF-LS 020900JAN2024. Date: 01/02/2024.	STATE_008440-446		*
P-0714	Operation Lone Star. Date: Jan. 2024.	STATE_008449-457		*
P-0715	Operation Lone Star. Date: Nov. 2023.	STATE_008466-475		*
P-0716	Email JTF-LS 020900OCT2023 COP. Date: 10/02/2023.	STATE_008476-481		*
P-0717	Operation Lone Star. Date: Sep. 2023.	STATE_008497-506		*
P-0718	Operation Lone Star. Date: April 2023.	STATE_008515-524		*
P-0719	Operation Lone Star. Date: June 2023.	STATE_008566-575		*
P-0720	Operation Lone Star. Date: Dec. 2023.	STATE_008616-624		*
P-0721	Operation Lone Star. Date: Nov. 2023.	STATE_008640-649		*
P-0722	Operation Lone Star. Date: Oct. 2023.	STATE_008653-662		*
P-0723	Operation Lone Star. Date: Sep. 2023.	STATE_008666-675		*
P-0724	Email JTF-LS 040700APR2023 COP. Date: 04/04/2023.	STATE_008676-677		*
P-0725	Operation Lone Star. Date: April 2023.	STATE_008684-693		*
P-0726	Operation Lone Star. Date: June 2023.	STATE_008735-744		*
P-0727	Operation Lone Star. Date: May 2023.	STATE_008771-780		*
P-0728	Operation Lone Star. Date: Aug. 2023.	STATE_008784-792		*
P-0729	Email JTF-LS 040900DEC2023 COP - UNCLASSIFIED - 2023-12-04T14_38_48_730Z Date: 12/04/2023.	STATE_008793-799		*
P-0730	Operation Lone Star. Date: Dec. 2023.	STATE_008802-810		*
P-0731	Operation Lone Star. Date: Nov. 2023.	STATE_008832-841		*
P-0732	Operation Lone Star. Date: Oct. 2023.	STATE_008845-854		*
P-0733	Operation Lone Star. Date: April 2023.	STATE_008863-872		*
P-0734	Operation Lone Star. Date: June 2023.	STATE_008912-921		*



**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0735	Operation Lone Star. Date: June2023.	STATE_008948-957		*
P-0736	Operation Lone Star. Date: Aug. 2023.	STATE_008961-969		*
P-0737	Operation Lone Star. Date: Dec. 2023.	STATE_008974-982		*
P-0738	Email JTF-LS 050900JUL2023 COP. Date: 07/05/2023.	STATE_008995-999		*
P-0739	Operation Lone Star. Date: July 2023.	STATE_009002-010		*
P-0740	Operation Lone Star. Date: Nov. 2023.	STATE_009014-023		*
P-0741	Operation Lone Star. Date: Oct. 2023.	STATE_009032-041		*
P-0742	Operation Lone Star. Date: Sep. 2023.	STATE_009045-054		*
P-0743	Operation Lone Star. Date: April 2023.	STATE_009063-072		*
P-0744	Operation Lone Star. Date: June 2023.	STATE_009112-121		*
P-0745	Operation Lone Star. Date: May 2023.	STATE_009148-157		*
P-0746	Operation Lone Star. Date: Aug. 2023.	STATE_009161-169		*
P-0747	Operation Lone Star. Date: Dec. 2023.	STATE_009174-182		*
P-0748	Operation Lone Star. Date: Jan. 2024.	STATE_009184-192		*
P-0749	Email JTF-LS 060900NOV2023 CDRs SITREP. Date: 11/06/2023.	STATE_009203-208		*
P-0750	Operation Lone Star. Date: Oct. 2023.	STATE_009224-233		*
P-0751	Operation Lone Star. Date: Sep. 2023.	STATE_009237-246		*
P-0752	Operation Lone Star. Date: April 2023.	STATE_009255-264		*
P-0753	Operation Lone Star. Date: June 2023.	STATE_009305-314		*
P-0754	Operation Lone Star. Date: May 2023.	STATE_009335-344		*
P-0755	Operation Lone Star. Date: Aug. 2023.	STATE_009366-374		*
P-0756	Operation Lone Star. Date: Dec. 2023.	STATE_009384-392		*
P-0757	Operation Lone Star. Date: Jan. 2024.	STATE_009394-402		*
P-0758	Operation Lone Star. Date: Nov. 2023.	STATE_009416-425		*
P-0759	Operation Lone Star. Date: Oct. 2023.	STATE_009430-439		*
P-0760	Operation Lone Star. Date: Sep. 2023.	STATE_009448-457		*
P-0761	Operation Lone Star. Date: April 2023.	STATE_009466-475		*



**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0762	Operation Lone Star. Date: May 2023.	STATE_009551-560		*
P-0763	Operation Lone Star. Date: Aug. 2023.	STATE_009564-572		*
P-0764	Operation Lone Star. Date: Dec. 2023.	STATE_009576-584		*
P-0765	Email JTF-LS 080900DEC2024 CDR SITREP. Date: 01/08/2024.	STATE_009585-592		*
P-0766	Operation Lone Star. Date: Jan. 2024.	STATE_009595-603		*
P-0767	Email JTF-LS 080900JUL2023 COP. Date: 07/08/2023.	STATE_009604-608		*
P-0768	Operation Lone Star. Date: July 2023.	STATE_009611-619		*
P-0769	Email JTF-LS 090700APR2023 COP. Date: 04/09/2023.	STATE_009659-660		*
P-0770	Operation Lone Star. Date: May 2023.	STATE_009740-749		*
P-0771	Operation Lone Star. Date: Aug. 2023.	STATE_009753-761		*
P-0772	Operation Lone Star. Date: Jan. 2024.	STATE_009777-785		*
P-0773	Email JTF-LS 090900NOV2023 COP - _UNCLASSIFIED - 2023-11-09T14_54_10_820Z_. Date: 11/09/2023.	STATE_009786-792		*
P-0774	Operation Lone Star. Date: Nov. 2023.	STATE_009795-804		*
P-0775	Email JTF-LS 090900OCT2023 COP. Date: 10/09/2023.	STATE_009805-810		*
P-0776	Operation Lone Star. Date: Oct. 2023.	STATE_009813-822		*
P-0777	Operation Lone Star. Date: June 2023.	STATE_009895-904		*
P-0778	Operation Lone Star. Date: April 2023.	STATE_010012-021		*
P-0779	Operation Lone Star. Date: June 2023.	STATE_010063-072		*
P-0780	Email JTF-LS 110900DEC2023 COP - _UNCLASSIFIED - 2023-12-11T15_11_00_100Z_. Date: 12/11/2023.	STATE_010121-126		*
P-0781	Email JTF-LS 110900DEC2024 CDR SITREP. Date: 01/11/2024.	STATE_010139-145		*
P-0782	Email JTF-LS 110900SEP2023 COP. Date: 09/11/2023.	STATE_010184-189		*
P-0783	Email JTF-LS 120700APR2023 COP. Date: 04/12/2023.	STATE_010202-203		*
P-0784	Operation Lone Star. Date: April 2023.	STATE_010210-219		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0785	Operation Lone Star. Date: June 2023.	STATE_010262-271		*
P-0786	Operation Lone Star. Date: May 2023.	STATE_010296-305		*
P-0787	Email JTF-LS 120900OCT2023 COP. Date: 10/12/2023.	STATE_010351-356		*
P-0788	Operation Lone Star. Date: April 2023.	STATE_010391-400		*
P-0789	Operation Lone Star. Date: June 2023.	STATE_010443-452		*
P-0790	Email JTF-LS 130700MAY2023 COP. Date: 05/13/2023.	STATE_010471-472		*
P-0791	Operation Lone Star. Date: May 2023.	STATE_010473-476		*
P-0792	Operation Lone Star. Date: May 2023.	STATE_010477-486		*
P-0793	Email JTF-LS 130900DEC2023 COP - UNCLASSIFIED - 2023-12-01T13_53_28_724Z_. Date: 12/13/2023.	STATE_010499-499		*
P-0794	Operation Lone Star. Date: Dec. 2023.	STATE_010500-501		*
P-0795	Operation Lone Star. Date: Dec. 2023.	STATE_010502-510		*
P-0796	Email JTF-LS 130900JAN2024 COP. Date: 01/13/2024.	STATE_010511-511		*
P-0797	Operation Lone Star. Date: Jan. 2024.	STATE_010512-520		*
P-0798	EmbeddedFile1.xlsx	STATE_010521-521		*
P-0799	EmbeddedFile2.xlsx	STATE_010522-522		*
P-0800	EmbeddedFile3.xlsx	STATE_010523-523		*
P-0801	EmbeddedFile4.xlsx	STATE_010524-524		*
P-0802	EmbeddedFile5.xlsx	STATE_010525-525		*
P-0803	EmbeddedFile6.xlsx	STATE_010526-526		*
P-0804	EmbeddedFile7.xlsx	STATE_010527-527		*
P-0805	EmbeddedFile8.xlsx	STATE_010528-528		*
P-0806	Operation Lone Star. Date: Jan. 2024.	STATE_010529-530		*
P-0807	Email JTF-LS 130900NOV2023 COP - UNCLASSIFIED - 2023-11-13T14_58_18_916Z_. Date: 11/13/2023.	STATE_010531-536		*
P-0808	Operation Lone Star. Date: Nov. 2023.	STATE_010537-538		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0809	Operation Lone Star. Date: Nov. 2023.	STATE_010539-548		*
P-0810	Email JTF-LS 130900OCT2023 COP. Date: 10/13/2023.	STATE_010549-550		*
P-0811	Operation Lone Star. Date: Oct. 2023.	STATE_010551-552		*
P-0812	Operation Lone Star. Date: Oct. 2023.	STATE_010553-562		*
P-0813	Email JTF-LS 130900SEP2023 COP. Date: 09/13/2023.	STATE_010563-563		*
P-0814	Operation Lone Star. Date: Sep. 2023.	STATE_010564-565		*
P-0815	Operation Lone Star. Date: Sep. 2023.	STATE_010566-575		*
P-0816	Email JTF-LS 140700APR2023 COP. Date: 04/14/2023.	STATE_010576-577		*
P-0817	Operation Lone Star. Date: June 2023.	STATE_010634-643		*
P-0818	Operation Lone Star. Date: March 2024.	STATE_011994-003		*
P-0819	Operation Lone Star. Date: March 2024.	STATE_012108-117		*
P-0820	EmbeddedFile6.xlsx	STATE_012123-123		*
P-0821	EmbeddedFile7.xlsx	STATE_012124-124		*
P-0822	Operation Lone Star. Date: Feb. 2024.	STATE_013265-279		*
P-0823	Operation Lone Star. Date: Nov. 2023.	STATE_013293-308		*
P-0824	Operation Lone Star. Date: Oct. 2023.	STATE_013309-318		*
P-0825	Operation Lone Star. Date: Feb. 2024.	STATE_013395-403		*
P-0826	Operation Lone Star. Date: Nov. 2023.	STATE_013693-702		*
P-0827	Email Floating Barrier info added to daily SITREP. Date: 07/17/2023.	STATE_016996-996		*
P-0828	Email Left/Right Seat - LNO SITREP to TF CDR. Date: 04/14/2023.	STATE_016997-059		*
P-0829	Buoy Barrier Debrief for Texas DPS. Date: 09/14/2023.	COCHRANE_0000003-254		*
P-0830	DPS - Project Rio. Date: 05/29/2023.	COCHRANE_0000017-032		*
P-0831	Assembly Step 1.	COCHRANE_0000033-053		*
P-0832	Concrete Anchor Rebar. Date: 05/25/2023.	COCHRANE_0000054-055		*
P-0833	Texas Turns the Tide.	COCHRANE_0000057-073		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0834	Aerial photograph.	COCHRANE_0000074-074		*
P-0835	Aerial photograph.	COCHRANE_0000075-075		*
P-0836	Texas Turns the Tide.	COCHRANE_0000076-087		*
P-0837	Texas Department of Public Safety. Date: 09/14/2023.	COCHRANE_0000088-238		*
P-0838	Floating Barrier System (FBS) Evaluation Report Outbrief. Date: 09/14/2023.	COCHRANE_0000239-254		*
P-0839	Photograph.	COCHRANE_0000257-306		*
P-0840	Cochrane USA invoice. Date: 04/18/2023.	COCHRANE_0000267-267		*
P-0841	Negotiated Terms and Conditions for Contract 2958 Cochrane Barrier Buoy. Date: 06/22/2023.	COCHRANE_0000268-298		*
P-0842	Cochrane's Terms and Conditions Negotiated pjs 06-22-2023. Date: 06/22/2023.	COCHRANE_0000299-303		*
P-0843	Subpoena to Produce Documents, Information, or Objects or to Permit inspection of Premises in a Civil Action. Date: 03/28/2024.	COCHRANE_0000304-306		*
P-0844	Email USIBWC Operations and Maintenance Division Watercraft and Equipment Assets. Date: 02/13/2024.	US0002302-302	*	
P-0845	Email USIBWC Survey Division Watercraft and Equipment Assets on the Rio Grande. Date: 02/13/2024.	US0002303-304	*	
P-0846	Email USIBWC Water Accounting Division Watercraft and Equipment Assets on the Rio Grande. Date: 02/13/2024.	US0002305-306	*	
P-0847	Expert Rebuttal Report Regarding the Historical Uses of the Lower Rio Grande River, Particularly in the Eagle Pass-Piedras Negras Area. Date: 07/12/2024.	US0002513-532		*
P-0848	Matt Walter, "Love on the Rio Grande: The 1850 Exploration by Captain Love." Journal of Big Bend Studies 19. Date: 2007.	US0002533-533	*	
P-0849	The Southwestern Historical Quarterly. Date: Oct. 1924.	US0002534-558	*	

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0850	Historia Mexicana. Date: Jan. 1972.	US0002559-603	*	
P-0851	The Rio Grande and Texas Land Co.	US0002604-612	*	
P-0852	La revolucio de la lectura durante el siglo XIX en Mexico.	US0002613-632	*	
P-0853	Republican Crisis and Civil War in North America. 1848-1867.	US0002633-055	*	
P-0855	Michael D. Chapman Resume.	US0003102-104		*
P-0856	Missouri River Navigation Project. Date: Jan. 1994.	US0003105-135		*
P-0857	Memo, Missouri River Bank Stabilization Project. Date: 04/05/1988.	US0003136-149		*
P-0858	Soundings 100 years of the Missouri River Navigation Project.	US0003150-338		*
P-0859	Texas - State Agencies.xlsx	USACE0006656-656		*
P-0860	Joint Public Notice. Date: 05/11/2017.	USACE0009252-265		*
P-0861	Water Resource Policies and Authorities Definition of Navigable Waters of the United States. Date: 09/11/1972.	USACE0009460-468		*
P-0862	Marine Resources Commission permit. Date: 04/17/2017.	USACE0011415-422		*
P-0863	Photograph.	USACE0011458-458		*
P-0864	Photograph.	USACE0011459-459		*
P-0865	Photograph.	USACE0011460-460		*
P-0866	VMRC. Date: 03/23/2015.	USACE0011461-472		*
P-0867	Letter in regard to Department of the Army permit application. Date: 09/03/2014.	USACE0011480-487		*
P-0868	Navsta Norfolk - Waterfront Barrier.	USACE0011502-505		*
P-0869	NAVSTA Waterfront.	USACE0011506-509		*
P-0870	Letter in reference to the Department of the Army application. Date: 05/03/2023.	USACE0011669-670		*
P-0871	Department of the Army Memorandum Documenting General Permit Verification. Date: 05/03/2023.	USACE0011671-681		*
P-0872	Email River Port Security Barrier. Date: 01/20/2023.	USACE0011682-692		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0873	Email JPA Submission for Installation of a Temporary Floating Security Barrier for Testing/Evaluation at Naval Station Norfolk. Date: 03/24/2015.	USACE0011703-717		*
P-0874	Regional Permit. Date: 08/14/2018.	USACE0011751-763		*
P-0875	Operation Lock and Key 2.0. Date: 05/18/2022.	USCG0000016-025		*
P-0876	Memo Navigability Determination. Date: 10/19/1984.	USCG0000028-035		*
P-0877	LANTAREA Briefing Slide. Date: 03/27/2024.	USCG0000160-160		*
P-0878	Photograph.	USCG0000169-169		*
P-0879	Photograph.	USCG0000170-170		*
P-0880	Operation Falcon Watch. Date: 06/26/2023.	USCG0000171-172		*
P-0881	U.S. Coast Guard Mishap Report. Date: 06/20/2023.	USCG0000173-174		*
P-0882	Memo Predeployment Site Survey (PDSS): Eagle Pass, TX. Date: 01/11/2024.	USCG0000175-176		*
P-0883	Communication Log. Date: 07/26/2017.	USCG0000177-177		*
P-0884	Search and Rescue. Initial Search and Rescue. Date: 07/25/2017.	USCG0000178-183		*
P-0885	Search and Rescue. General Search and Rescue. Date: 05/04/2015.	USCG0000184-190		*
P-0886	Case Report. SAR Disabled Vessel. Date: 05/03/2015.	USCG0000191-195		*
P-0887	Case Report. SAR - P/C T.O.W. - Falcon Lake. Date: 07/26/2017.	USCG0000196-199		*
P-0888	LANTAREA Briefing Slide. Date: 05/23/2023.	USCG0000200-201		*
P-0889	LANTAREA Briefing Slide. Date: 06/01/2023.	USCG0000202-203		*
P-0890	LANTAREA Briefing Slide. Date: 06/08/2023.	USCG0000204-206		*
P-0891	OP Lock & Key. Date: 05/12/2023.	USCG0000207-208		*
P-0892	LANTAREA Briefing Slide. Date: 05/12/2023.	USCG0000209-210		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0893	DEPOD 20-072L. Date: 02/10/2020.	USCG0000211-211		*
P-0894	Sector Corpus Christi Enforcement Falcon Lake OPSUM. Date: 04/16/2023.	USCG0000212-213		*
P-0895	Operations Order to USCG forces for Operation Falcon Watch. Date: 04/16/2023.	USCG0000214-219		*
P-0896	LANTAREA Briefing Slide. Date: 06/29/2023.	USCG0000220-222		*
P-0897	LANTAREA Briefing Slide. Date: 06/21/2023.	USCG0000223-225		*
P-0898	LANTAREA Briefing Slide. Date: 05/18/2023.	USCG0000226-226		*
P-0899	Title 33 - Navigation and Navigable Waters. Date: 07/09/2024.	USCG0000227-227		*
P-0900	Title 33 - Navigation and Navigable Waters. Date: 07/09/2024.	USCG0000228-228		*
P-0901	Title 33 - Navigation and Navigable Waters. Date: 07/09/2024.	USCG0000229-229		*
P-0902	Title 33 - Navigation and Navigable Waters. Date: 07/09/2024.	USCG0000230-231		*
P-0903	Title 33 - Navigation and Navigable Waters. Date: 07/09/2024.	USCG0000232-232		*
P-0904	Title 46 - Shipping.	USCG0000233-234		*
P-0905	Subchapter C - Uninspected Vessels.	USCG0000235-308		*
P-0906	U.S. Coast Guard Mishap Report. Date: 07/26/2022.	USCG0000309-310		*
P-0907	Waterways Management (WWM): Hazards to Navigation Tactics, Techniques, and Procedures (TTP). Date: Feb. 2016.	USCG0000311-348		*
P-0908	Title 33 - Navigation and Navigable Waters. Date: 07/10/2024.	USCG0000349-351		*
P-0909	Title 33 - Navigation and Navigable Waters. Date: 07/08/2024.	USCG0000352-352		*
P-0910	Memorandum of Agreement Between the United States Army Corps of Engineers and the United States Coast Guard. Date: 06/02/2000.	USCG0000611-613		*



**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0911	Memorandum of Understanding Between United States Army Corps of Engineers and United States Coast Guard Regarding the Mitigation of Obstructions to Navigation. Date: 10/05/2012.	USCG0000614-620		*
P-0912	United States Coast Guard Maritime Commerce Strategic Outlook. Date: Oct. 2018.	USCG0000621-660		*
P-0913	Certification of Inspection. Date: 06/27/2023.	USCG0000688-689		*
P-0914	Certification of Inspection. Date: 10/28/2021.	USCG0000690-691		*
P-0915	U.S. Coast Guard Maritime Law Enforcement Manual (MLEM). Date: 11/20/2020.	USCG0000692-718		*
P-0916	Chapter 5 - Non Coast Guard Maintained Aids.	USCG0000719-735		*
P-0917	Aids to Navigation Manual Administration. Date: 03/02/2005.	USCG0000736-748		*
P-0918	Jesse Sumpter, REMINISCENCES.		*	
P-0919	Inland Waterway Navigation Value to the Nation (Zhao Report Ex. 3).			*
P-0920	USACE Inland Navigation Economics Cost-Benefit Analysis 101 (Zhao Report Ex. 28). Date: 12/02/2015.			*
P-0921	Cora Montgomery [Jane Cazneau], Eagle Pass; or Life on the Border. Date: 09/29/1852.		*	
P-0922	Defendants' Response to U.S. Requests for Admission. Date: 03/11/2024.			*
P-0923	Expert Report of Tong Zhao. Date: 06/14/2024.			*
P-0924	Response to letter regarding activities carried out by the State of Texas. Date: 08/14/2023.	DOS_0199680-681		*
P-0925	The withdrawal of the connected buoys and structures, installed by authorities of the State of Texas. Date: 08/17/2023.	DOS_0199822-822	*	
P-0926	Letter Field visit performed by this Mexican Section. Date: 06/09/2023.	DOS0191799-801	*	
P-0927	Email DPS//Cochrane Weekly Check In. 6.16.2023. Date: 06/16/2023.	STATE_007899-900		*



**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0929	The Fur Trade Review. Date: 03/01/1898.		*	
P-0930	Frederick Law Olmstead, A Journey Through Texas. Date: 1857.		*	
P-0931	Border Report, "'We aren't asking for permission': Gov. Abbott defends use of concertina wire along El Paso border" (April 12, 2023). Date: 04/12/2023.			*
P-0932	1870 U.S. Census, Eagle Pass, Texas (excerpt). Date: 07/16/1870.		*	
P-0933	1915 Annual Report of the Chief of Engineers, Appendix: A Historical Summary Giving the Scope of Previous Projects for the Improvement of Certain Rivers and Harbors (excerpt). Date: 1915.		*	
P-0934	1860 U.S. Census, Eagle Pass, Texas (excerpt). Date: 07/26/1860.			*
P-0935	1880 U.S. Census, Maverick County, Texas (excerpt). Date: 06/05/1880.			*
P-0936	Chapman Report Appendix A.	US0003097-097		*
P-0937	Chapman Report Appendix B.	US0003098-098		*
P-0938	Rebuttal Expert Report of Michael D. Chapman.	US0003056-101		*
P-0939	Chapman Report Appendix D.	US0003100-100		*
P-0940	Chapman Report Figure 1.	US0003064-064	*	
P-0941	Chapman Report Figure 2.	US0003065-065	*	
P-0942	Chapman Report Figure 3.	US0003066-066		*
P-0943	Chapman Report Figure 4.	US0003067-067	*	
P-0944	Chapman Report Figure 5.	US0003067-067		*
P-0945	Chapman Report Figure 6.	US0003068-068	*	
P-0946	Chapman Report Figure 7.	US0003071-071		*
P-0947	Chapman Report Figure 8.	US0003077-077		*
P-0948	Chapman Report Figure 9.	US0003078-078		*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0949	Chapman Report Figure 10.	US0003079-079		*
P-0950	Chapman Report Figure 11.	US0003080-080		*
P-0951	Chapman Report Figure 12.	US0003081-081		*
P-0952	Chapman Report Figure 13.	US0003081-081		*
P-0953	Chapman Report Figure 14.	US0003082-082		*
P-0954	Chapman Report Figure 15.	US0003082-082		*
P-0955	Chapman Report Figure 16.	US0003083-083		*
P-0956	Chapman Report Figure 17.	US0003083-083		*
P-0957	Chapman Report Figure 18.	US0003084-084		*
P-0958	Chapman Report Figure 19.	US0003085-085		*
P-0959	Chapman Report Figure 20.	US0003085-085		*
P-0960	Chapman Report Figure 21.	US0003086-086		*
P-0961	Chapman Report Figure 22.	US0003086-086		*
P-0962	Chapman Report Figure 23.	US0003087-087		*
P-0963	Chapman Report Figure 24.	US0003088-088		*
P-0964	Chapman Report Figure 25.	US0003088-088		*
P-0965	Chapman Report Figure 26.	US0003089-089		*
P-0966	Chapman Report Figure 27.	US0003089-089		*
P-0967	Chapman Report Figure 28.	US0003090-090		*
P-0968	Chapman Report Figure 29.	US0003091-091		*
P-0969	Chapman Report Figure 30.	US0003092-092		*
P-0970	Chapman Report Figure 31.	US0003093-093		*
P-0971	Chapman Report Table 1.	US0003095-095		*
P-0972	Title 33 - Navigation and Navigable Waters.			*
P-0973	Chapter 1 - Coast Guard, Dept. of Transportation.			*
P-0974	Title 33 - Navigation and Navigable Waters.			*

**United States v. Greg Abbott, et al.****Case No. 1:23-cv-00853-DAE (W.D. Tex.)****United States' Trial Exhibits**

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Label</b>	<b>Will Offer</b>	<b>May Offer</b>
P-0975	Chapter 1 - Coast Guard, Dept. of Transportation.			*
P-0976	Texas Experts' Omnibus Draft Report Outline (redacted).	STATE_017061-077		*
P-0977	Cover email to Texas Experts' Omnibus Draft Report Outline (redacted). Date: 06/04/2024.	STATE_017060-060		*
P-0978	Oral and Videotaped Deposition of Expert Witness Michael Chapman. Date: 07/19/2024.			*
P-0979	Chapman Dep. Ex. 1.			*
P-0980	Chapman Dep. Ex. 2.			*
P-0981	Chapman Dep. Ex. 3.			*
P-0982	Chapman Dep. Ex. 4.			*
P-0983	Chapman Dep. Ex. 5.			*
P-0984	Chapman Dep. Ex. 6.			*
P-0985	Chapman Dep. Ex. 7.			*
P-0986	Chapman Dep. Ex. 8.			*
P-0987	Chapman Dep. Ex. 9.			*
P-0988	Oral and Videotaped Deposition of Francisco Sainz. Date: 07/11/2024.			*
P-0989	William H. Emory, Report on the United States and Mexican Boundary Survey (1857). Date: 1857.			*
P-0990	Frank Leslie's Illustrated Newspaper (Sept. 3, 1864). Date: 09/03/1864.			*
P-0991	Handwritten Letter to Asst. Quartermaster's Office. Date: 03/15/1849.		*	
P-0992	Handwritten Letter to Asst. Quartermaster's Office. Date: 03/15/1849.		*	
P-0993	Travelers and the Fireside. The Eagle Pass; or Life on the Border. Date: 09/29/1852.		*	

Dated: October 28, 2024

JAIME ESPARZA  
UNITED STATES ATTORNEY

/s/ Landon A. Wade

LANDON A. WADE

Assistant United States Attorney  
TX Bar No. 24098560  
United States Attorney's Office  
903 San Jacinto Blvd., Suite 334  
Austin, TX 78701  
(512) 370-1255 (tel)  
(512) 916-5854 (fax)  
[Landon.wade@usdoj.gov](mailto:Landon.wade@usdoj.gov)

TODD KIM  
ASSISTANT ATTORNEY GENERAL  
Environment & Natural Resources Division

/s/ Brian H. Lynk

BRIAN H. LYNK

Senior Trial Counsel  
DC Bar No. 459525  
BRYAN J. HARRISON  
Trial Attorney  
FL Bar No. 106379  
KIMERE J. KIMBALL  
Trial Attorney  
CA Bar No. 260660  
ANDREW D. KNUDSEN  
Trial Attorney  
DC Bar No. 1019697  
U.S. Department of Justice  
Environmental Defense Section  
P.O. Box 7611  
Washington, DC 20044  
(202) 514-6187 (Lynk)  
(202) 514-8865 (fax)  
[Brian.lynk@usdoj.gov](mailto:Brian.lynk@usdoj.gov)  
[Bryan.harrison@usdoj.gov](mailto:Bryan.harrison@usdoj.gov)  
[Kimere.kimball@usdoj.gov](mailto:Kimere.kimball@usdoj.gov)  
[Andrew.knudsen@usdoj.gov](mailto:Andrew.knudsen@usdoj.gov)

*Counsel for United States of America*

**CERTIFICATE OF SERVICE**

I certify that on October 28, 2024, a copy of this filing was served on counsel of record through the Court's electronic filing system.

/s/ Brian H. Lynk